

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
	:	
<b>SECURITIES AND EXCHANGE</b>	:	
<b>COMMISSION,</b>	:	
	:	
Plaintiff,	:	<b>19 Civ. 09439 (PKC)</b>
	:	
v.	:	<b>ECF Case</b>
	:	
<b>TELEGRAM GROUP INC. and TON</b>	:	
<b>ISSUER INC.,</b>	:	
	:	
Defendant.	:	
-----	X	

**MOTION TO SEAL**

Non-party Investor Z, by and through its attorneys, hereby moves for an order sealing the documents attached to Investor Z's accompanying memorandum of law as Exhibits 1-A, 2-A, and 3-A.

The grounds for this motion, as well as descriptions of the documents, are set forth in the accompanying memorandum of law. As the memorandum explains in detail, interests in proprietary rights, privacy rights, and encouraging assistance with enforcement outweigh the presumption of public access to the material Investor Z seeks to seal.

A proposed order is attached.

Dated: February 4, 2020

Respectfully submitted,

S/ Charles A. Brown

---

Charles A. Brown

*CBrown@goodwinlaw.com*

GOODWIN PROCTER LLP

The New York Times Building

620 Eighth Avenue

New York, NY 10018

Tel.: +1 212 813 8800

Fax: +1 212 355 3333

*Attorneys for Non-Party Investor Z*